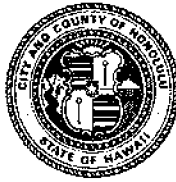

Status : Action Completed
Record Date : 1/7/2009
First Name : Doug
Last Name : Lentz
Business/Organization : U.S. Department of the Interior, National Park Service
Address : 300 Ala Moana, Box 50165
Apt./Suite No. : Rm 6-226
City : Honolulu
State : HI
Zip Code : 96850
Email : Doug_Lentz@nps.gov
Telephone : 808-541-2693
Telephone Extension : 737
Add to Mailing List : Both
Submission Method : Website
Submission Content/Notes : Hello,
I am compiling the responses for the Draft EIS for the National Park Service.
Please include me on your mailing list.
I have a hard copy and disk copy. Are there any upcoming public meetings or meetings with those that need to be involved for consultation?
Thank you for your time,
Doug

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR



WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-337211

Mr. Doug Lentz
National Park Service
U.S. Department of the Interior
300 Ala Moana Boulevard, Room 6-226
P. O. Box 50165
Honolulu, Hawaii 96850

Dear Mr. Lentz:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Thank you for your interest in the project. The National Park Service has been notified of applicable consultation meetings.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

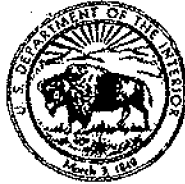
Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne Y. Yoshioka", is written over the typed name.

WAYNE Y. YOSHIOKA
Director

Enclosure

AR00062714



United States Department of the Interior

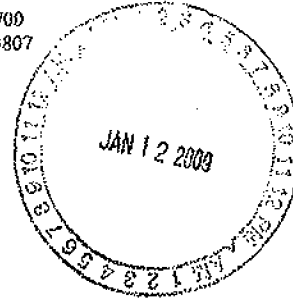
NATIONAL PARK SERVICE
Pacific West Region
1111 Jackson Street, Suite 700
Oakland, California 94607-4807



IN REPLY REFER TO:

A3615 (PWR-PA)

JAN 06 2009



Leslie Rogers
Regional Administrator
U. S. Department of Transportation
Federal Transit Administration
201 Mission Street
Suite 1650
San Francisco, CA 94105-1839

Dear Mr. Rogers:

Thank you for your recent letter notifying the Department of the Interior, National Park Service (NPS) of the City and County of Honolulu's Department of Transportation Services (DTS) consultation for a proposed 20-mile elevated guideway transit system on Oahu and your invitation to participate in this consultation per 36 C.F.R. § 800.10(c). The National Park Service accepts the invitation and looks forward to working with you and your staff.

Your letter also seeks our determination about prospects for a de minimus finding for the impact of the Honolulu High-Capacity Transit Corridor Project on the Pearl Harbor National Historical Landmark District (NHL). The NPS supports the concept of a transit system with a primary or alternate route that includes a station with convenient access to the USS Arizona Memorial (included with the recently designated WWII Valor in the Pacific National Monument) and will participate in the planning process as applicable. However, the proposed de minimus finding seems premature and the NPS cannot, at this time, concur with a de minimus finding due to the reasons described below. NPS will participate in the ongoing consultation process and will provide our determination once an assessment of effect for the Pearl Harbor NHL District, the Bowfin NHL, and the Valor in the Pacific National Monument have been completed and once we have conferred with the State Historic Preservation Office. The NPS also will provide formal comments on the Draft Environmental Impact Statement (DEIS) by the February 6 deadline.

Proposed Transit System Construction within the Pearl Harbor NHL. The boundary of the NHL proceeds along the Pearl Harbor side of Kamehameha Highway from Aloha Stadium to the opposite side of Radford Drive. Three station entrances (stops) to the transit system are proposed within that distance: Aloha Stadium Station, Arizona Memorial Station, and Pearl Harbor Naval Base Station. The DEIS only discusses impacts associated with the Pearl Harbor Naval Base Station (Table 4-32, Historic Properties within Project's Area of Potential Effect). The DEIS should analyze the potential impacts of the other two proposed station entrances within the Pearl Harbor National Historic Landmark before a de minimus

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finding can be considered. For example, there would be a major impact at the proposed USS Arizona Memorial Station proposed to be located on an existing NPS parking lot. There is currently not enough parking at the site, so losing this parking space would have a major effect on NPS operations and visitation.

Visual Impact. A 30-40 foot tall elevated guideway transit system along Kamehameha Highway could cause significant negative impacts to the Pearl Harbor NHL view shed. The NPS recommends that a view shed analysis be completed for the proposed route before a de minimus finding can be considered.

Potential Impacts to Soundscape. The DEIS is not clear about the existing acoustic environment and what impacts to the soundscape of the Pearl Harbor NHL the proposed guideway rail system would generate. A soundscape analysis should be completed to determine impacts to the Pearl Harbor and USS Bowfin NHL's and the USS Arizona Memorial before a de minimus finding can be considered.

Potential Vibration Effects. The DEIS states that vibration levels should not exceed 65 VdB, which is below the 72 VdB allowed by the FTA around residential buildings. Analysis should be included for potential vibration effects on historic structures before a de minimus finding can be considered.

WWII Valor in the Pacific National Monument. The DEIS does not analyze the potential impact to the newly designated monument.

At this time, the NPS does not concur with a de minimus finding in regards to impacts of the Honolulu High-Capacity Transit Corridor Project on the Pearl Harbor NHL. The National Park Service looks forward to working with the conferees to develop the measures necessary to eliminate or mitigate adverse effects of the proposed transit project on the significant historic resources of the Pearl Harbor NHL District, the USS Bowfin NHL, and the WWII Valor in the Pacific National Monument.

Sincerely,

Patricia A. Neubacher

for

Jonathan B. Jarvis
Regional Director, Pacific West Region

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR



WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338271

Mr. Jonathan B. Jarvis, Regional Director
National Park Service, Pacific West Region
U.S. Department of the Interior
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

Dear Mr. Jarvis:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Based on concerns raised by Section 106 consulting parties, including the National Park Service, preliminary effect determinations described in the Honolulu High-Capacity Transit Corridor Historic Resources Technical Report (RTD 2008o) and the Draft EIS were reconsidered. An effects evaluation for all eligible resources was completed and the results are documented in the Honolulu High-Capacity Transit Corridor Historic Effects Report (RTD 2009d). This report was provided to the National Park Service for consultation under Section 106 of the National Historic Preservation Act (as amended). The State Historic Preservation Division (SHPD) has concurred with the 22 adverse effect determinations and recommended that an additional 11 resources were adversely affected. FTA accepted these

additional adverse effect determinations. The determinations of effect and the SHPD's concurrence are presented in Section 4.16 in this Final EIS.

The U.S. Naval Base Pearl Harbor National Historic Landmark (NHL) district and the CINCPACFLT Headquarters were determined to be in the Area of Potential Effects (APE) and identified as such in the Honolulu High-Capacity Transit Corridor Historic Resources Technical Report (RTD 2008o). Potential Project impacts to the Pearl Harbor NHL and historic properties associated with it and the CINCPACFLT Headquarters were reevaluated and addressed in the Honolulu High-Capacity Transit Corridor Historic Effects Report (RTD 2009d). This portion of the report is preceded by a special section explaining the methodology used to evaluate these resources. Although the Historic Effects Report concluded that there was no adverse effect to these NHLs, the SHPD did not concur and FTA agreed to accept the SHPD's recommendation. Ossipoff's Aloha Chapel was also determined to be adversely affected by the Project. The NHLs USS Arizona, USS Utah, and USS Bowfin are not within the APE and, therefore, are not part of the Historic Effects Report.

The City refined the Project design to avoid and minimize impacts to the NHL and, therefore, there are no direct impacts from the Project and there is no need for the NPS to concur on de minimis impacts within the NHL. Chapter 5 of the Final EIS includes the Section 4(f) evaluation.

Impacts resulting from the Arizona Memorial Station were not reevaluated in the Historic Effects Report since this station was part of the Airport & Salt Lake Alternative in the Draft EIS. This station is not part of the Project as defined in this Final EIS and, therefore, will not cause any effects to resources.

Based on the National Park Service's comment, additional viewshed analysis was conducted for the Project. Section 4.8, Visual and Aesthetic Conditions, in this Final EIS includes this viewshed analysis with two visual simulations that demonstrate that the Project would have a low visual effect on the Pearl Harbor National Historic Landmark and the portion of the World War II Valor in the Pacific National Monument that is contained within Pearl Harbor's boundaries.

Based on the National Park Service's comment, additional noise analysis was completed to determine the impacts of the Project on the Pearl Harbor National Historic Landmark acoustic environment. After consultation with the National Park Service regarding sampling locations, noise measurements and analyses were completed at three additional locations. Using FTA guidelines, no noise impacts were found (see Section 4.10.3 for figure identifying the noise measurement locations and results (Aloha Stadium to Kalihi), in the Final EIS). Vibration effects from the Project were determined using the detailed vibration assessment information and procedures contained in the FTA's Transit Noise and Vibration Impact Assessment (FTA 2006a). FTA reference data on ground transmission of vibration energy were used to estimate vibration levels. Based on this analysis, there is no long-term vibration impact to historic resources. Vibration impacts and mitigation are discussed in Section 4.18.5 of the Final EIS and in the Programmatic Agreement for the Project (Appendix H of the Final EIS).

Mr. Jonathan B. Jarvis
Page 3

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne Y. Yoshioka", written in a cursive style.

WAYNE Y. YOSHIOKA
Director

Enclosure



United States Department of the Interior

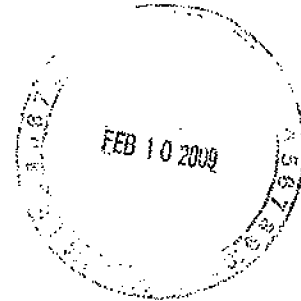
NATIONAL PARK SERVICE
Pacific West Region
1111 Jackson Street, Suite 700
Oakland, California 94607-4807



IN REPLY REFER TO:

A3615 (PWR-PA)

FEB 06 2009



Wayne Y. Yoshida
Director, Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshida:

Thank you for your letter and Draft Environmental Impact Statement (EIS) to review regarding the City and County of Honolulu's Department of Transportation Services (DTS) proposed Honolulu High-Capacity Transit Corridor Project.

The National Park Service (NPS) supports the concept of a transit system with a primary or alternate route that includes a station with convenient access to Valor in the Pacific National Monument (formerly known as the USS Arizona Memorial) but has some significant concerns and comments. Please see the enclosure for a complete list of NPS comments. The National Park Service looks forward to working with the U. S. Department of Transportation on this important project. If you have any questions please contact Frank Hays at 808-541-2693 extension 723 or email him at Frank_Hays@nps.gov.

Sincerely,



Jonathan B. Jarvis
Regional Director, Pacific West Region

Enclosure

cc:

✓ Ted Matley, Federal Transit Administration, Region IX
Frank Hays, Pacific West Region, Honolulu
Patty Neubacher, Pacific West Region

TAKE PRIDE
IN AMERICA 

AR00062720

REVIEW COMMENTS

DATE: 2/4/09

AGENCY: National Park Service (NPS)

PROJECT: Honolulu High-Capacity Transit Corridor

REVIEWERS: Doug Lentz, Paul DePrey, Frank Hays, Elaine Jackson-Retondo, Melia Lane-Kamahele, Alan Schmierer

No.	Page	Topic	Comment
1.	5-6 thru 5-9	Table 5-2, Historic Properties	Consideration/analysis of the impact to the newly established World War II Valor in the Pacific National Monument (NM), Pearl Harbor (NHL), USS Arizona Memorial (NHL), and USS Bowfin (NHL) is absent throughout this DEIS. Analysis of these resources needs to be incorporated. These resources should also be identified on a map that shows their boundaries and proximity to the elevated transit system.
2.	S-8	Archaeological, Cultural, and Historic Resources, paragraph 5 and 6.	It states that up to 61 historic resources for the project could be affected (moved/damaged/destroyed). "Appropriate mitigation measures are discussed in the following Construction Effects section." Mitigation measures are not discussed in the Construction Effects section.
3.	S-9	Cost and Financial Analysis	The Pearl Harbor Historic Sites (USS Bowfin Submarine Museum and Park, Pacific Aviation Museum, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument, formally USS Arizona Memorial) receive over 1.5 million visitors a year, one of the most visited destinations in the Pacific. All visitors access the Pearl Harbor Historic Sites through World War II Valor in the Pacific National Monument. The National Park Service (NPS) supports either an alternative that includes the Airport Alternative with a stop in reasonable proximity to the NM or a public transportation option that transports visitors from the Salt Lake Alternative (Salt Lake Station) to the NM.
4.	2-19	Airport Alternative	This alternative states "Stations would be constructed at Aloha Stadium, Pearl Harbor Naval Base, Honolulu International Airport, and Lagoon Drive." However, all maps that pertain to this area, and other locations in the DEIS, identify a station at the NM, formally USS Arizona Memorial. See comment 3.

5.	3-29	Figure 3-10	If both the Salt Lake and Airport alternatives are implemented consider consolidating the two Aloha Stadium stations.
6.	3-44	3.4.5. Mitigation of Long-term Transportation Effects Traffic	The NPS is concerned about commuter parking at the NM station. There is currently not enough parking for visitors to the NM. Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument) in discussions about the NM station location.
7.	3-45 3-48	3.5 Construction-related Effects on Transportation Table 3-26 3.5.7 Mitigation of Construction-related Effects	There is only one road from King Kamehameha Highway that accesses the Pearl Harbor Historic Sites, Arizona Memorial Place. The DEIS does not address this cross street in the narrative or on table 3-26. The Maintenance of Traffic Plan needs to plan for the traffic issues at this intersection prior to construction. The Pearl Harbor Historic Sites are a destination for over 4,000 visitors a day. Please work with the Pearl Harbor Historic Sites to plan for vehicular access for employees and visitors.
8.	4-31	Figure 4-11 Community Resources and Facilities within One-half Mile, Aloha Stadium to Kalihi	Identify World War II Valor in the Pacific National Monument, formally USS Arizona Memorial, and USS Bowfin Submarine Museum and Park as parks or recreation facilities within one-half mile of the transit system.
9.	4-36	Table 4-7 (property acquisition)	The Pearl Harbor Historic Sites are not listed in the table of community facilities and services that will be affected.

	4-36	and Airport Alternative	The DEIS proposes a station at World War II Valor in the Pacific National Monument, formally USS Arizona Memorial. The NPS has concerns with a station at this proposed location. Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument) in discussions about the NM station location.
10	4-37	Parklands and Recreation Facilities	The DEIS does not acknowledge, or address the effects of, acquisition of property at the NM but it does show the footprint of a station on the commercial parking lot. There will be a major effect on World War II Valor in the Pacific National Monument if a station is located on half of the commercial bus parking lot. This will need further discussion and involvement with the NPS.
11	4-40 4-41	Affected Environment Neighborhoods Aiea	This section looks at neighborhoods adjacent to the project and the anticipated effects. The Pearl Harbor Historic Sites attract over 1.5 million visitors to Pearl Harbor every year and are located in the Aiea neighborhood but are not considered in the DEIS.
12	4-59	Visually Sensitive Resources Kalihi to Ala Moana Center Landscape Unit	The DEIS identifies "Pearl Harbor (East Loch)" in the wrong section. Pearl Harbor is located in the two prior sections, Aloha Stadium to Kalihi and Fort Weaver Road to Aloha Stadium.
13	4-65 to 84	Viewpoints	The before and after pictures are extremely helpful. A before and after viewshed analysis from the USS Arizona Memorial, the USS Bowfin and from other Ford Island sites looking toward the proposed railway (mauka) should be completed. Consult with NPS and US Navy historians to identify and take actions to preserve or mitigate impacts to historic viewsheds.

14	4-100	4.9.3 Environmental Consequences and Mitigation	Include the noise model that was used to project noise levels. It should include the noise level 100 yards away from the raised rail line. No noise projections or estimates were done between Aloha Stadium and Hickam Air Force Base and need to be. Noise projections range up to 75 dBA. That is too loud for quiet contemplation or interpretive talks.
15	4-108	4.10.2 Electric and Magnetic Fields	The maintenance facility at the NM is within the 200 feet of the transit rail line and has not been evaluated for electric and magnetic concerns.
16	4-125	4.12.3 Environmental Consequences and Mitigation	All night lighting should be down lighting to reduce light pollution of night skies and to protect an endangered bird species.
17	4-142	4.15.1 Section 106	The NPS should be on this list to review.
18	4-168	4.18.2 Indirect Effects Airport Alternative	In the DEIS the Arizona Memorial Station and Aloha Stadium Station were left out of this section, both of which are within the Pearl Harbor NHL. Therefore, there are three stations within the NHL and the cumulative impact of that should be evaluated.
19	4-169	4.18.3 Cumulative Effects	See comment 18.
20	5-2,3	De Minimis Impacts	At this time, the NPS does not concur with a <i>de minimis</i> finding in regards to impacts of the project on the Pearl Harbor, USS Arizona Memorial, and USS Bowfin NHLs.
21	5-4	Table 5-1 Publicly Owned Parks and Rec. Areas Adjacent to Project Alignment	The World War II Valor in the Pacific National Monument, formerly USS Arizona Memorial, is publicly owned and adjacent and should be included here. .
22	5-5	5.4 Direct Use of Section 4(f) Properties 5.4.1 Park and Rec. Resources	Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument, formally USS Arizona Memorial) in discussions about the NM station location
23	5-34	5.5.2 Parks and Rec. Resources	The NM should fall into Section 4(f) consideration.

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR



WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338279R

Mr. Jonathan B. Jarvis
National Park Service, Pacific West Region
U.S. Department of the Interior
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

Dear Mr. Jarvis:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

NPS Comment 1

Potential Project impacts to the CINCPACFLT Headquarters and Pearl Harbor National Historic Landmark and historic properties associated with it were evaluated and addressed in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (RTD 2009d). This report contains information, including mapping, detailing the methodology used to evaluate these resources. Although the Project team determined that there were no adverse effects to the NHL, the State Historic Preservation Division (SHPD) did not concur with these evaluations. FTA agreed to accept these adverse effect determinations. Final determinations of effect are documented in this Final EIS, Section 4.16. A figure illustrating the location of these resources

has been added to the Final EIS Section 4.16. Effects to the World War II Valor in the Pacific National Monument were also considered, although this resource type is not specifically provided for under Section 106. Please note that the USS Arizona Memorial and the USS Bowfin are not within the Area of Potential Effects for this project. Section 4.5 of the Final EIS identifies community resources and facilities within one-half mile of the Project. This figure has been revised in this Final EIS to include World War II Valor in the Pacific National Monument.

NPS Comment 2

The discussion of construction effects on Archaeological, Cultural, and Historic Resources is included in Section 4.18.11, Archaeological, Cultural, and Historic Resources, in this Final EIS, and includes discussion of mitigation measures, including sampling, monitoring, and where appropriate, preservation of such resources. The Programmatic Agreement (Appendix H of the Final EIS) identifies measures will be employed to mitigate potential impacts to archaeological resources and all work will follow applicable state laws. The effects to historic resources were re-evaluated after the publication of the Draft EIS. The effect determinations are presented in Section 4.16.3 of the Final EIS. Thirty-three historic resources will be adversely affected by the Project. Any potential construction impacts to historic properties will be mitigated using measures outlined in previous construction sections related to noise, vibration, air quality, and water quality.

NPS Comment 3

The National Park Service's support for an alternative that is in reasonable proximity to the National Monument (NM) is noted. The Preferred Alternative as presented in the Final EIS includes a station at Aloha Stadium. Visitors can walk or transfer to a bus to visit the NM.

NPS Comment 4

As indicated in Figure 2-7 of the Draft EIS, the Arizona Memorial Station would have been constructed only for the Airport & Salt Lake Alternative. The City has identified the Airport Alternative as the preferred alternative.

NPS Comment 5

As indicated in Figure 2-7 of the Draft EIS, each alternative would have had a different station location or combination of station locations in the vicinity of Aloha Stadium. The City has selected the Airport Alternative as the preferred alternative. This alternative includes one station at Kamehameha Highway at Salt Lake Boulevard.

NPS Comment 6

There is no longer a station planned near the Arizona Memorial. The closest station will be almost a half-mile away at Aloha Stadium. Parking would be provided for commuters at Aloha Stadium Station, and therefore, it is not expected that commuters would park at the Arizona Memorial to use the Project.

NPS Comment 7

Table 3-27 in this Final EIS presents information on lane closures during construction of the fixed guideway system. Under the Airport Alternative, one lane will be closed in the Koko Head-bound direction on Kamehameha Highway from Salt Lake Boulevard to Center Drive. Arizona Memorial Place is within this segment. This is expected to have temporary traffic impacts on Kamehameha Highway during construction.

NPS Comment 7

As discussed in Section 3.5.7, Mitigation of Construction-related Effects, in this Final EIS a Maintenance of Traffic (MOT) Plan will be developed by the contractor prior to construction, and will describe road closures and delays. Maintaining traffic flow and access are the primary objectives of these plans. As stated in this Final EIS, "During final design...detailed Work Zone Traffic Control plans, including detour plans, would be formulated in cooperation with the City, HDOT, and other affected jurisdictions." Coordination with the Pearl Harbor Historic Sites will occur and access to the Memorial will be maintained throughout the construction period to minimize disruption.

As stated in Section 8.7, Continuing Public Involvement through Construction, in this Final EIS, several public involvement strategies will be utilized to inform businesses and the general public (and, in this case, the NPS and Memorial staff) about construction activities, including roadway detours and temporary arrangements to accommodate construction activities. These strategies include: a public involvement plan developed prior to construction to inform business owners of the construction schedule and activities, public information campaigns to inform people that businesses and other visitor destinations are open during construction and to encourage their continued patronage, and public information regarding construction activities and ongoing activities provided in print and on television and radio.

NPS Comment 8

Section 4.5 of the Final EIS identifies community resources and facilities within one-half mile of the Project. This figure has been revised in this Final EIS to include World War II Valor in the Pacific National Monument.

NPS Comment 9

The Project will not acquire land from the Pearl Harbor Sites and therefore, it is not listed in Section 4.5.3 as a community facility that will be affected by the Project. As indicated in Figure 2-7 of the Draft EIS, the Arizona Memorial Station would have been constructed only for the Airport & Salt Lake Alternative. The City has selected the Airport Alternative as the preferred alternative.

NPS Comment 10

The preferred alternative for the project is the Airport Alternative only, which extends from East Kapolei to Ala Moana Center. The Arizona Memorial Station referred to would only be constructed if the combined Airport and Salt Lake Alternative were selected. The Airport

Alternative, the Salt Lake Alternative and the Airport & Salt Lake Alternative were carried forward in the Draft EIS, and none was identified as the preferred alternative at that time. The City has since identified the Airport Alternative as the preferred alternative. This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 80-261 identifying the Airport Alternative. Therefore, the Arizona Memorial Station will not be constructed, and no land acquisition would occur within the commercial bus parking lot of Aloha Stadium.

NPS Comment 11

Section 4.5, Community Services and Facilities of the Final EIS, including parklands and recreational facilities, has been revised to include the Pearl Harbor Historic Sites are adjacent to the Project and acknowledges the 1.5 million visitors a year.

NPS Comment 12

The reference to "Pearl Harbor (East Loch) in the discussion of the Kalihi to Ala Moana Center Landscape Unit, has been deleted in this Final EIS.

NPS Comment 13

After consultation with NPS, two additional visual simulations were prepared and views from the NM were analyzed. The viewshed analysis of the World War II Valor in the Pacific National Monument at Pearl Harbor has been prepared and added to Section 4.8 in this Final EIS. The viewshed analysis in the Final EIS includes two additional viewpoints: visual simulation from the Arizona Memorial looking mauka and visual simulation from the World War II Valor in the Pacific National Monument Visitor Center parking lot looking mauka. The analysis showed that the Project would not affect the NHL's visual integrity and will hardly be visible on mauka views from the Harbor. The Project elements will be dominant visual elements along the mauka edge of the NHL Visitor Center parking lot."

NPS Comment 14

As stated in Section 4.10.1 of the Final EIS, noise measurements were taken at 46 noise sensitive location along the study corridor. Eight of the noise measurements were taken at sites near the Arizona Memorial and Pearl Harbor Naval Base in response to comments on the Draft EIS.

Noise analysis was completed at the Arizona Memorial Remembrance Circle, parking lot, and boat dock. The results are included in Section 4.10.3 of the Final EIS and in the Noise Technical Report Addendum. There will be no noise impact at these locations as a result of the Project.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

NPS Comment 15

The Honolulu High-Capacity Transit Corridor Electric and Magnetic Fields Technical Report (RTD 2008h) indicates: "3.1 Field Survey of Potentially Affected Facilities Sensitive land uses that may be affected by changes to the Earth's geomagnetic field from operation of the Project could include research, manufacturing, medical, and possibly military facilities that use tools that depend on the stability of the Earth's field. These tools can include, but may not be limited to, electron microscopes, nuclear magnetic resonance spectrometers, and magnetic resonance imaging (MRI) equipment used for medical diagnostic purposes.

Verification of land uses in the study area was necessary because the City and County of Honolulu (City) does not have a designated land use map in its General Plan. Therefore, the following steps were taken to establish existing conditions:

- 1. Prior to conducting field verification, the following land uses were mapped according to readily available data: high-voltage power lines, medical and diagnostic facilities, institutional and research facilities, and military operations.*
- 2. The maintenance facility at the National Monument to which you refer to does not meet "the tools that depend on the stability of the Earth's field" methodology and will not be effected.*

NPS Comment 16

In Section 4.8.3 of this Final EIS, the following design criteria will be implemented in Final Design as mitigation measures to minimize lighting effects:

- The quality of the lighting design will greatly influence the appearance and attractiveness of stations and will play an important role in enabling the public's acceptance of the system and the stations.*
- Glare from transit station lights or reflective surfaces will be reduced to an absolute minimum such that it does not affect the vision of motorists.*
- Light spill will be prevented from the stations onto roadways and areas adjacent to stations and station sites.*
- Brightness and glare will be reduced to an absolute minimum by:*
 - Locating light sources to avoid direct reflection or by selecting anti-reflective finishes.*
 - Minimizing or eliminating undesirable reflections in glazed and polished surfaces, glass, walls and other similar elements.*
 - Minimizing or eliminating light spillage onto adjacent properties and eliminating night sky pollution. This will be done using full cut-off luminaires (fixture and lamp design) and low-reflective surfaces.*

- *Light sources in parking structures will not be visible from outside the structure, particularly those on the upper decks.*

NPS Comment 17

The National Park Service has been added to the list of agencies and groups in Section 4.16.1, Background and Methodology, in this Final EIS that have participated as consulting parties as part of the Section 106 process.

NPS Comment 18

The Airport Alternative has been identified as the preferred alternative, and therefore, the Arizona Memorial Station is no longer being considered. The environmental effects related to the Aloha Stadium Station are discussed in Section 4.19.2, Indirect Effects, in this Final EIS. These two stations differ from the other project stations. Both are fairly remote from other developments and not likely to have any indirect transit-oriented development (TOD) effects. The primary land use near the Aloha Stadium is the Stadium and Pearl Harbor Navy facilities, neither of which is likely to be redeveloped before 2030.

NPS Comment 19

The cumulative impact analysis as presented in Section 4.19.3 of the Final EIS has been expanded since the Draft EIS and discusses the cumulative effects of the Project and describes the past, present, and reasonably foreseeable actions in the study corridor. The environmental effects related to the Aloha Stadium Station are discussed in this section as part of the overall Project analysis.

NPS Comment 20

FTA has accepted SHPD's recommendation that the Project will have an adverse effect to the Pearl Harbor NHL. In addition, there will be no direct use of land by the Project in U.S. Naval Base Pearl Harbor HNL, USS Arizona Memorial, and USS Bowfin National Historic Landmarks. Therefore, a de minimis approach is no longer applicable.

NPS Comment 21

The World War II Valor in the Pacific National Monument, identified as the United States Naval Base Pearl Harbor NHL, has been added to Table 5-2, Historic Resources Evaluated for Section 4(f) Use, in this Final EIS.

NPS Comment 22

Section 5.5.2, Historic Sites, in this Final EIS has been revised to identify that there will be no use of the Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and USS Arizona Memorial.

Mr. Jonathan B. Jarvis
Page 7

NPS Comment 23

The National Monument has been added Section 5.5.2, Historic Sites, in this Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Wayne Y. Yoshioka', written in a cursive style.

WAYNE Y. YOSHIOKA
Director

Enclosure